

PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

January 15, 1997

Cert. Mail No. P 371 603 785

Ash Grove Cement Co.  
Mr. Henrik Voldbaek, Manager  
3801 E. Marginal Way S.  
Seattle, WA 98134

RECEIVED  
JAN 17 1997  
AGCW-SEATTLE

Dear Mr. Voldbaek:

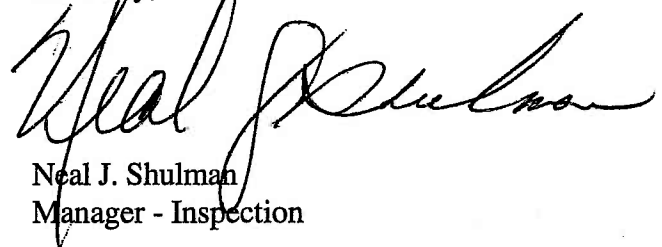
Disposition of Notices of Violation No. 36944, 36945, 36946, and 36947  
Compliance Status Reports, dated January 10, 1997  
Registration No. 11339

Based on the information you provided us in your October 1996 CEM report, this Agency considers Notice of Violation No. 36945 closed. We will take no further enforcement action on this case.

Please also find enclosed Notices of Violation No. 36944, 36946, and 36947 as well as two Compliance Status Reports. These matters remain open.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

MM:dcr  
Enclosure

cc: Elizabeth M. Gilpin, Air Pollution Inspector  
Rosemary G. Busterna, Senior Air Pollution Inspector  
Melissa McAfee, Air Pollution Inspector  
Fred L. Austin, Air Pollution Engineer

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

▲ (206) 343-8800 ▲ (800) 552-3565 ▲

FAX: (206) 343-7522  
printed on recycled paper

AGCS2M000955

# PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038  
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

INB. 36945

Cert. Mail No. P 371 603 785

## NOTICE OF VIOLATION

Date of Violation: October 5<sup>th</sup>, 19 96 at \_\_\_\_\_ .m.

<b>Name</b>  <div style="font-size: 1.2em; font-family: cursive;">Ash Grove Cement Co.</div>	<b>Responsible Person, Title</b>  <div style="font-size: 1.2em; font-family: cursive;">Henrik Voldback Manager</div>		
<b>Location of Violation (Address)</b>  <div style="font-size: 1.2em; font-family: cursive;">3801 E. Marginal Way So.</div>	<b>City</b>  <div style="font-size: 1.2em; font-family: cursive;">Seattle</div>	<b>Zip</b>  <div style="font-size: 1.2em; font-family: cursive;">98134</div>	<b>County</b>  <div style="font-size: 1.2em; font-family: cursive;">King</div>
<b>Mailing Address</b>  <div style="font-size: 1.2em; font-family: cursive;">As Above</div>	<b>City, State</b>  <div style="font-size: 1.2em; font-family: cursive;">Seattle WA.</div>	<b>Zip</b>  <div style="font-size: 1.2em; font-family: cursive;">98134</div>	<b>Phone</b>  <div style="font-size: 1.2em; font-family: cursive;">762-0660</div>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

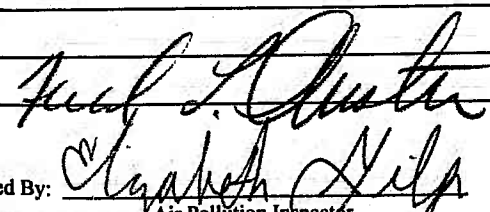
REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6
- ☐ Section Emissions from the main baghouse stack not to exceed the most stringent PSD limits or the following: CO 1049 ppm corrected to 10% O<sub>2</sub> 8 hr Ave.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION October Cem Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

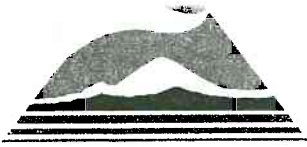
Signed By:   
 Air Pollution Inspector  
 No. 70-119 (Revised 12/95 cbc)

11/3/96  
 Date/Time

Received By: \_\_\_\_\_

AGCS2M000956

Signing this Notice is not an admission of guilt



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

September 23, 1996

Ash Grove Cement Co.  
c/o Henrik Voldbaek  
3801 E Marginal Way S  
Seattle, WA 98134

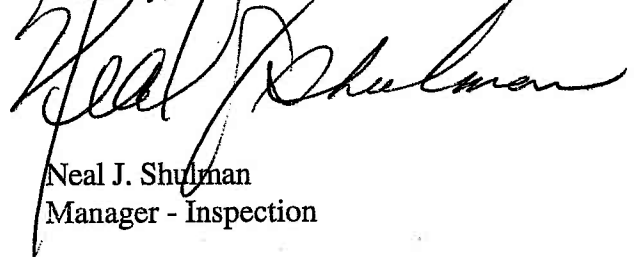
Dear Mr. Voldbaek:

Ash Grove Cement Co.  
Disposition of Notice of Violation No. 36931

Based on the information you provided to us in your July 1996 CEM report dated September 5, 1996, this Agency considers the above-referenced matter closed. We will take no further enforcement action on this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

NJS:kes

cc: Elizabeth Gilpin, Inspector  
Rosemary Busterna, Lead Inspector  
Melissa McAfee, Inspector  
Fred Austin, Engineer

RECEIVED

SEP 24 1996

AGCW-SEATTLE

Dennis J. McLerran, Air Pollution Control Officer  
B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Brian Ebersole, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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Registration No. 11339  
Cert. Mail No. P588633581

No. **36931**

## NOTICE OF VIOLATION

Date of Violation: July 2<sup>nd</sup>, 19 96 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Manager		
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  95 above	City, State  Seattle, WA.	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☐ Section 9.09(b)(2) Emission of air contaminants from the main stack  
as determined by a CEMS not to exceed 5% opacity for 2 hr Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION July CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/23/96

Date/Time

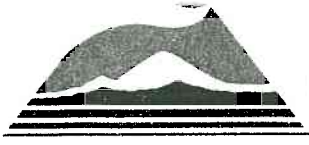
KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000958





PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

September 10, 1996

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way  
Seattle, WA 98134

RECEIVED  
SEP 13 1996  
AGCW-SEATTLE

Dear Mr. Voldbaek:


**Disposition of Notice of Violation No. 36924, 36925, 36926, and 36927  
PSAPCA Reg. No. 11339**

Based on the information you provided to us in your June 1996 CEM Report and corrective action letter dated July 30, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

Please also find enclosed Notice of Violation No. 36923 which also stems from your June 1996 CEM Report and remains open.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

  
Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Brian Ebersole, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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Registration No. 11339  
Cert. Mail No. P 588 633 576

No. **36924**

## NOTICE OF VIOLATION

Date of Violation: 6-2, 19 96 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Way</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section 9.09 (b)(2) Emissions > 20% opacity > 5% opacity for  
1 hour average

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION 6/96 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time

KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000960

110 Union Street, Suite 500, Seattle, Washington 98101-2038  
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. P 588 633 576

No. **36925**

## NOTICE OF VIOLATION

Date of Violation: 6-7, 19 96 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>		
Location of Violation (Address) <u>3801 E. Marginal Way</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section 9.09 (b)(2) Emissions > 50% opacity for 1 hour average

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION 6/96 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: Paul L. Christ  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

Date/Time  
9/12/96  
KS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000961

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
 Cert. Mail No. P 588 633 576

No. **36926**

# NOTICE OF VIOLATION

Date of Violation: 6-18, 19 96 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Way</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5396</u>

## DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(c) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_

☒ Section 9.09 (b)(2) Emissions → 7 min > 5% opacity for 1 hour average

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION 6/96 CEM report

## CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

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Issued By: [Signature]  
 Air Pollution Inspector  
 Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
 Date/Time  
KS

Received By: \_\_\_\_\_  
 Signing this Notice is not an admission of guilt  
**AGCS2M000962**



Registration No. 11339  
Cert. Mail No. P588633576

No. **36927**

## NOTICE OF VIOLATION

Date of Violation: 6-18, 19 96 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek, Mgr</u>	
Location of Violation (Address) <u>3801 E. Marginal Way</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_

☒ Section 9.09(b)(1) Emissions > 20% for > 3min in any  
1 hour

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION

6/96 CEM report

### CORRECTIVE ACTION ORDER

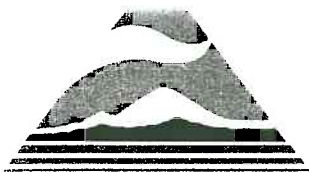
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

Date/Time  
KS 9/12/96

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000963



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

April 17, 1996

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way S  
Seattle, WA 98134

Dear Mr. Voldbaek:

**Disposition of Notice of Violation No. 36923**

Based on the information provided in your June 1996 CEM Report, this Agency considers the above-referenced incident an excused violation and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Elizabeth Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Rosemary G. Busterna, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

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Registration No. 11339  
Cert. Mail No. P 588 633 576

No. **36923**

## NOTICE OF VIOLATION

Date of Violation: 6/22, 19 96 at \_\_\_\_\_, m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldbaet, Manager</u>		
Location of Violation (Address) <u>3801 E. Marginal Wy</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>KING</u>
Mailing Address <u>Same</u>	City, State <u>, WA</u>	Zip	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6A Emissions > 1049ppm, 8-hr average for CO

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION 6/96 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

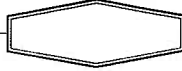
Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
K8

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000965

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

September 23, 1996

Neal J. Shulman  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Mr. Shulman:

**Re: Notice of Violation 36923**

The following is in response to your letter dated September 10, 1996 and received September 13, 1996.

**NOV # 36923:**

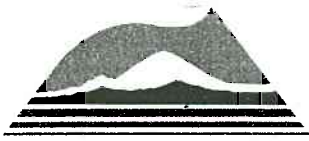
The eight hour average for CO emissions was 1151 ppmc for the period between 16:00 and 24:00 on 6/22/96. This was caused by inconsistent feeding of whole tires being used as fuel to the calciner.

We have already implemented and are continuing to implement changes to the process to solve the problems of erratic tire flow and the spikes to the CO emissions it causes. A fifteen minute average of the CO has been added, in addition to an instantaneous reading, to the operator screens. This gives the operators a more realistic view of the continuous CO values than the instantaneous values. An alarm has been set up on the fifteen minute average at 90% of the 1000 ppmc limit on the 8 hour average. Mechanical changes have been made from designing better ways for the tires to enter the feed chute to better access to clear plugs in the feed chute. We are continuing to make these changes as problems become apparent.

Sincerely,

J. Trygve Grey  
Assistant Plant Superintendent





PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

September 10, 1996

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way  
Seattle, WA 98134

RECEIVED  
SEP 13 1996  
AGCW-SEATTLE

Dear Mr. Voldbaek:

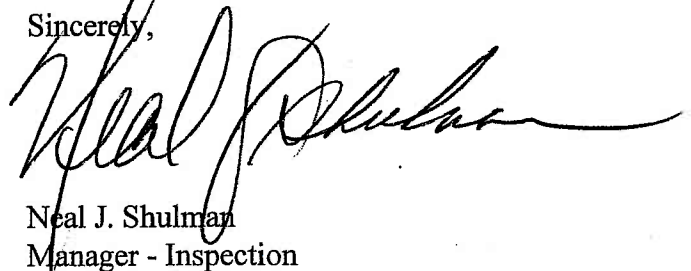
**Disposition of Notice of Violation No. 36922  
PSAPCA Reg. No. 11339**

Based on the information you provided to us in your May CEM Report and corrective action letter dated June 28, 1996, this Agency concurs that the May 26th excursions of the Reg. I 9.09(b)(1) and Reg. I 9.09(b)(2) standards meet the WAC criteria for upset. The Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

Please also find enclosed Notices of Violation No. 36912, 36913, 36914, 36915, 36916, 36917, 36918, 36919, 36920, and 36921. These violations also stem from your May 1996 CEM Report and remain open. *closed*

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

EMG\cbc

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Brian Ebersole, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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FAX: (206) 343-7522  
printed on recycled paper

AGCS2M000967

110 Union Street, Suite 500, Seattle, Washington 98101-2038  
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. P588 633 576

No. **36922**

## NOTICE OF VIOLATION

Date of Violation: May 26, 19 96 at \_\_\_\_\_ m.

Name  <u>Ash Grove Cement Co.</u>	Responsible Person, Title  <u>Henrik Voldbaek Manager</u>		
Location of Violation (Address)  <u>3801 E Marginal Way So.</u>	City  <u>Seattle</u>	Zip  <u>98134</u>	County  <u>King</u>
Mailing Address  <u>As Above</u>	City, State  <u>Seattle, WA.</u>	Zip  <u>98134</u>	Phone  <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_

☒ Section 9.09(b)(2) Emissions shall not exceed 5% opacity for a 1 hr Ave as  
measured by a CEMS.

☒ Section 9.09(b)(1) Emissions Not to exceed 20% opacity for 3 minutes in any 1 hr. as  
determined by a CEMS, main stack.

FACTS ALLEGED TO CONSTITUTE A VIOLATION May 1996 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: Chizhik  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96

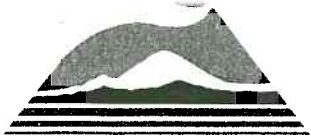
Date/Time

KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000968



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

October 31, 1996

RECEIVED

NOV 01 1996

AGCW-SEATTLE

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way S  
Seattle, WA 98134

Dear Mr. Voldbaek:

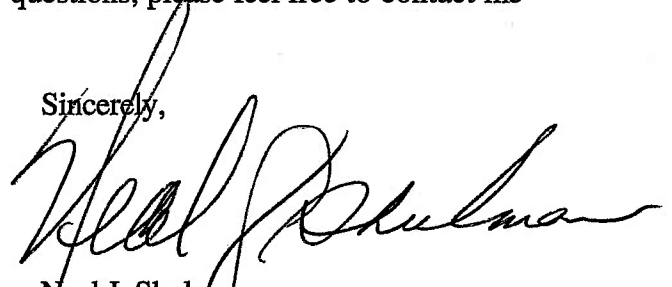
Notices of Violation No. 36914 - 36920

We have evaluated your corrective action response dated September 23, 1996, regarding Notices of Violation No. 36914 - 36920. Since the levels reported occurred during start-up and were under the limits specified in Notice of Construction No. 5730 Condition No. 7, these Notices of Violation are hereby rescinded.

Notices of Violation No. 36912, 36913, and 36921 remain open.

Thank you for your cooperation. If you have any questions, please feel free to contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary Busterna, PSAPCA  
Elizabeth Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred Austin, PSAPCA

EMG/cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Brian Ebersole, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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Registration No. 11339

Cert. Mail No. P 588 632

No. **36914**

## STATE OF VIOLATION

Name  A. <i>Recinded w/wc Action</i>	Responsible Person, Title  Henrik Voldback Manager		
	City  Seattle	Zip  98134	County  King
Location  3801	City, State  Seattle, WA.		
Mailing Ad  AS	Zip  98134	Phone  (206) 623-5596	

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOx 1 hr. Ave.

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION May 1996 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: *[Signature]*  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

7/12/96  
Date/Time  
KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000970



110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. P 588 633 576

NO. **36915**

## NOTICE OF VIOLATION

Date of Violation: May 7, 19 96 at \_\_\_\_\_ .m.

Name  Ash Grove Cement Co.		Responsible Person, Title  Henrik Voldback Manager	
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  AS Above	City, State  Seattle, WA	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOx 1 hr Ave.

☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector

Date/Time  
9/12/96  
KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000971

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. P588 633 576

No. **36916**

## NOTICE OF VIOLATION

Date of Violation: MAY 6, 19 96 at \_\_\_\_\_ .m.

Name  Ash Grove Cement Co.		Responsible Person, Title  Henrik Voldback Manager	
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  As Above	City, State  Seattle, WA.	Zip  98134	Phone  623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOX 1 hr. Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By:   
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
KS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
**AGCS2M000972**

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. P 588 633 576

NO. **36917**

## NOTICE OF VIOLATION

Date of Violation: MAY 8

19 96

at \_\_\_\_\_ m.

Name  Ash Grove Cement CO.		Responsible Person, Title  Henrik Voldback Manager	
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  As Above	City, State  Seattle, WA.	Zip  98134	Phone  623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOx 1 hr Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM REPORT

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]

Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbc)

9/12/96

Date/Time

KS

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000973

110 Union Street, Suite 500, Seattle, Washington 98101-2038  
206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339  
Cert. Mail No. P 588 633 576

No. **36918**

## NOTICE OF VIOLATION

Date of Violation: May 9, 1996 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Manager		
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  As Above	City, State  Seattle, WA.	Zip  98134	Phone  623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOX 1 hr. Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM REPORT

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
KS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
AGCS2M000974



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Registration No. 11339  
Cert. Mail No. P588 633 576

No. **36919**

## NOTICE OF VIOLATION

Date of Violation: May 10, 19 96 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback Manager</u>	
Location of Violation (Address) <u>3801 E. Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
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- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☐ Section Emissions from the main stack not to exceed 700 ppm MAX 1 hr. Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 CEM REPORT

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
KS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000975

Registration No. 11339  
Cert. Mail No. 588 633 576

No. **36920**

## NOTICE OF VIOLATION

Date of Violation: MAY 15, 19 96 at \_\_\_\_\_ .m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldbaek Manager</u>	
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6B
- ☐ Section Emissions from the main stack not to exceed 700 ppm NOx 1 hr. Avc.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION MAY 1996 Cem Report

### CORRECTIVE ACTION ORDER

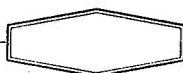
Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
FS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
**AGCS2M000976**

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

September 23, 1996

Neal J. Shulman  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Mr. Shulman:

**Re: Notices of Violation 36912 - 36921**

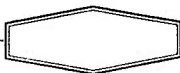
The following is in response to your letter dated September 10, 1996 and received September 13, 1996.

**NOV # 36912:**

The hourly average for SO<sub>2</sub> concentration between the hours of 9:00 and 10:00 on 5/6/95 was 251 ppmc. During this time we were in the preheat stage of our startup. At this time we are heating the system with a gas flame at a rate of about 1/4 the heat input of normal operations. To not cause undue to the system, and to ensure proper heating, the combustion air flow rate is also 1/4 our normal rate. Running the system at this low flow rate does not allow us to add the dry sorbent to the gas stream to scrub sulfur. At this low air flow rate, the sorbent would not be caught in the air stream to scrub our gaseous emissions. It would settle out in the flat spots or transition areas of our duct work, where it would be ineffective. We started production at 9:55 and at this time started adding lime to scrub the sulfur. The excess emissions were brought within our permit limits immediately. The source of the sulfur is material that is present in the system from the previous shutdown. It is impossible to remove this material without causing undue damage to the kiln system , in particular the kiln's refractory lining.

This incident should be exempt from penalty under WAC 173-400-107 section 4. The excess emissions were due to startup and are unavoidable. They could not have been prevent through better planning or design. We could not use the lime scrubbing system at this time as it would cause severe property damage.

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

## NOV # 36913:

At 8:00, 5/4/96 there was a spike in our CO level through the kiln system over 2.5%. This automatically removed fuel from the system. It is unknown what caused the high CO levels, as the kiln was operating fairly stably at the time. When the CO was purged from the system, gas was put back on the kiln. The kiln began to heat up at this time causing the hourly average for NO<sub>x</sub> between the hours of 09:00 and 10:00 to reach 751 ppmc. The operator took steps to stabilize and cool the kiln.

## NOV # 36914:

The kiln had been shut down at 00:15 on 5/5/96. At 00:30, feed was put back on. There were two hours after this which showed NO<sub>x</sub> over 700 ppmc. Between 01:00 and 03:00 the NO<sub>x</sub> averages were 781 ppmc and 823 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36915:

The kiln had been shut down at 07:30 on 5/7/96. At 07:50 the flame was put back in the kiln, and at 08:00 feed was put back on. For the hour between 08:00 and 09:00 the NO<sub>x</sub> average was 720 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36916:

The kiln had been shut down at 03:45 on 5/5/96. At 16:00 the flame was put back in the kiln, but was taken off again at 20:45. The flame was put back on 5/6/96 at 00:00. At 09:55 feed was put back on. For the hour between 12:00 and 13:00 the NO<sub>x</sub> average was 780 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36917:

The kiln had been shut down at 07:30 on 5/7/96. At 07:50 the flame was put back in the kiln, and at 08:00 feed was put back on. For the hour between 03:00 and 04:00 the NO<sub>x</sub> average was 735 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.



# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

## NOV # 36918:

The kiln had been shut down at 06:54 on 5/9/96. At 07:15 the flame was put back in the kiln, and at 07:25 feed was put back on. For the hour between 08:00 and 09:00 the NO<sub>x</sub> average was 849 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36919:

The kiln had been shut down at 16:05 on 5/10/96. At 16:20 the flame was put back in the kiln, and at 16:35 feed was put back on. For the hour between 18:00 and 19:00 the NO<sub>x</sub> average was 713 ppmc. This period however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36920:

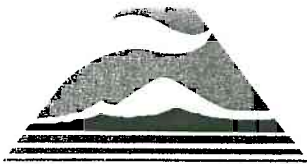
The kiln had been shut down at 21:00 on 5/5/96. At 23:00 the flame was put back in the kiln, and at 23:10 feed was put back on. Between 14:00 and 16:00 the NO<sub>x</sub> hourly averages were 810 ppmc and 840 ppmc. Between 18:00 and 20:00 the NO<sub>x</sub> hourly averages were 784 ppmc and 864 ppmc. Between 21:00 and 22:00 the NO<sub>x</sub> hourly average was 784 ppmc. These periods however fell under startup and should be subject to the startup limit of 1000 ppmc.

## NOV # 36921:

In the late morning of 5/3/96, the opacity from the main baghouse began to rise slowly. The bag house showed to be operating normally. There were no jumps or sudden drops in the opacity that would indicate problems with a specific compartment and all the operating pressures and temperatures appeared normal. Upon visual inspection of the stack, a light brown plume was noticed. This color plume is typical with high NO<sub>x</sub> emissions. This was also consistent with our emissions levels at the time. The operator was already taking steps to reduce the NO<sub>x</sub> emissions. The hourly opacity average between 12:00 and 13:00 was 7.5 %. This was brought down within the 5% limit as process changes were made to reduce the NO<sub>x</sub> emissions.

Sincerely,

J. Trygve Grey  
Assistant Plant Superintendent



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

April 17, 1997

Henrik Voldbaek, Manager  
Ash Grove Cement Company  
3801 E Marginal Way S  
Seattle, WA 98134

Dear Mr. Voldbaek:


**Disposition of Notice of Violation No. 36921**

The above referenced Notice of Violation was issued as a result of Ash Grove's May 1996 Continuous Emission Report which reflected a violation on May 3, 1996, of this Agency's Regulation I, Section 9.09(b)(2).

The file regarding this matter was misplaced within our office and, as a result, an inordinate amount of time has elapsed since the Notice of Violation was issued to Ash Grove.

Therefore, we are closing Notice of Violation No. 36921 and will be taking no further enforcement action in this case. If you have any questions concerning this matter, please contact me at 689-4095.

Sincerely,



Neal J. Shulman  
Manager-Inspection

cc: Elizabeth Gilpin, Air Pollution Inspector  
Melissa McAfee, Air Pollution Inspector  
Fred L. Austin, Air Pollution Engineer  
Rosemary G. Busterna, Senior Air Pollution Inspector  
Laurie Halvorson, General Counsel

NJS/cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

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Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

**AGCS2M000980**

Mayor, Tacoma  
Mayor, Seattle  
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Registration No. 11339  
Cert. Mail No. P 588 633 576

No. **36921**

## NOTICE OF VIOLATION

Date of Violation: May 3, 1996 at \_\_\_\_\_, m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldbaek Manager		
Location of Violation (Address)  3801 E Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  As Above	City, State  Seattle WA	Zip  98134	Phone  623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section 9.09(b)(2) Emissions shall not exceed 5% opacity for a 1 hr. Ave.  
as measured by a CEMS
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION May 1996 CEM Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By:   
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

9/12/96  
Date/Time  
KS

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000981



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

July 26, 1996

Reg. No. 11339

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way S  
Seattle, WA 98134

Dear Mr. Voldbaek:

The Agency has reviewed your April 1996 CEM Report. Please find enclosed Notices of Violation No. 35765, 35766, 35767, 35768, 35769. Also, find case closure letters for Notices of Violation No. 35765, 35766, 35767, and 35769.

In the future, when opacity exceedances are attributed to steam, Ash Grove must submit the Method 9 observation records and certifications of the readers along with the CEM Report.

Please feel free to call me if you have any questions at 689-4055.

Sincerely,

Fred L. Austin  
Air Pollution Engineer

cc: Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Rosemary G. Busterna, PSAPCA

MM/cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY      KITSAP COUNTY      PIERCE COUNTY      SNOHOMISH COUNTY

July 3, 1996

Reg. No. 11339

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way S  
Seattle, WA 98134

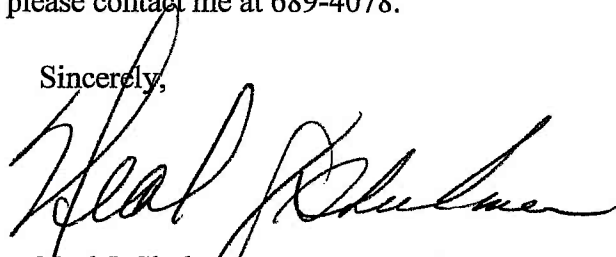
Dear Mr. Voldbaek:

**Disposition of Notice of Violation No. 35765, 35766, 35767, and 35769**

Based on the information you provided to us in your April 1996 CEM Report dated May 23, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
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Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

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AGCS2M000983

Registration No. 11339

Cert. Mail No. \_\_\_\_\_

No. **35765****NOTICE OF VIOLATION**Date of Violation: April 29, 1996 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Manager		
Location of Violation (Address)  3801 E Marginal Wy So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State  Seattle, WA.	Zip  98134	Phone  (206)623-5596

**DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:**REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.  
☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.  
☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.  
☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.  
☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.  
☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.  
☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.  
☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.  
☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.  
☐ Section 9.20 Failure to operate and maintain equipment in good working order.  
☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_.  
☒ Section 9.09(b)(2) emissions shall not exceed 5% opacity for a 1 hr.  
Ave as measured by a CEMS.  
☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1996 CEM report**CORRECTIVE ACTION ORDER**

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

Date/Time 7/2/96

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000984

Registration No. 11339  
Cert. Mail No. \_\_\_\_\_

No. **35766**

## NOTICE OF VIOLATION

Date of Violation: April 29, 19 96 at \_\_\_\_\_m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback Manager</u>	
Location of Violation (Address) <u>3801 E Marginal Wy So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>as above</u>	City, State <u>Seattle WA</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section 9.09(b)(1) emissions shall not exceed 20% opacity for more than 3 minutes in any 1 hr. as determined by a CEMS.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1996 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

7/2/96  
Date/Time

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000985

Registration No. 11339  
Cert. Mail No. \_\_\_\_\_

No. **35767**

## NOTICE OF VIOLATION

Date of Violation: April 25, 1996 at \_\_\_\_\_, m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Plant Manager		
Location of Violation (Address)  3801 E Marginal Wy So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State  Seattle, WA	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☒ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main baghouse stack not to exceed 700 ppm NOX 1 hr Ave
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1996 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbo)

Date/Time [Signature]

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000986



Registration No. 11339

Cert. Mail No. \_\_\_\_\_

No. **35769****NOTICE OF VIOLATION**Date of Violation: April 30, 1996 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Manager		
Location of Violation (Address)  3801 E Marginal Wy So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State  Seattle, WA.	Zip  98134	Phone  (206) 623-5596

**DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:**

REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.  
☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.  
☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.  
☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.  
☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.  
☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.  
☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.  
☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.  
☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.  
☐ Section 9.20 Failure to operate and maintain equipment in good working order.  
☒ Failure to meet Order of Approval No. 5730, Condition No. 6(A)  
☐ Section Baghouse emissions Main stack not to exceed 1049 ppm CO 8 hr. Ave.  
☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION April 1996 CEM report**CORRECTIVE ACTION ORDER**

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

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 Issued By: [Signature]  
 Air Pollution Inspector

Form No. 70-119 (Revised 12/95 cbe)

Date/Time 7/12/96

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

AGCS2M000987



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    KITSAP COUNTY    PIERCE COUNTY    SNOHOMISH COUNTY

July 3, 1996

Reg. No. 11339

Henrik Voldbaek  
Ash Grove Cement Co.  
3801 E Marginal Way S  
Seattle, WA 98134


Dear Mr. Voldbaek:

**Disposition of Notice of Violation No. 35764**

Based on the information you provided to us in your March 1996 CEM Report dated April 30, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

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Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038    (206) 343-8800    (800) 552-3565    FAX: (206) 343-7522

printed on recycled paper

**AGCS2M000988**

Registration No. 11339  
Cert. Mail No. \_\_\_\_\_

No. **35764**

## NOTICE OF VIOLATION

Date of Violation: March 3, 19 96 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Plant Manager		
Location of Violation (Address)  3801 E. Marginal Wy. So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State  Seattle, WA	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☐ Section 9.09 (b)(2) Unlawful to cause or allow the emission of any air  
contaminant as determined by a CEMS greater than 5% opacity
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION March 1996 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

7/2/96  
Date/Time

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M000989



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY KITSAP COUNTY PIERCE COUNTY SNOHOMISH COUNTY

May 1, 1996

Gerry Brown  
Ash Grove Cement Co.  
3801 E. Marginal Way S.  
Seattle, WA 98134

RECEIVED  
MAY - 8 1996  
AGCW-SEATTLE

Dear Mr. Brown:

**Disposition of Notice of Violation No. 35757  
Registration No. 11339**

Based on the information you provided to us in your addendum to the February 1996 CEM Report, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. The Agency concurs that the WAC 173-400-107 applies.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer  
B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County  
Janet Chalupnik, Member at Large  
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton  
R.C. Johnson, Councilman, Snohomish County  
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma  
Norman B. Rice, Mayor, Seattle  
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

AGCS2M000990





PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY      KITSAP COUNTY      PIERCE COUNTY      SNOHOMISH COUNTY

March 3, 1997

*Rec 4*

Ash Grove Cement Co.  
Henrik Voldbaek  
3801 E Marginal Way S  
Seattle, WA 98134

**Disposition of Notice of Violation Nos 36210, 36211, 36212, and 36213  
Registration No. 11339**

Dear Mr. Voldbaek:

Based on the information you provided to us in your January 1997 CEM Report, this Agency considers NOV No. 36213 closed and will take no further enforcement action in this case.

*Feb 3/17*  
*closed - closed*  
Notices of Violation Nos. 36210, 36211, and 36212 remain open. Please respond to the correction action order on NOVs 36210 and 36211 within 10 days.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

*Neal J. Shulman*  
Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer  
B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

**AGCS2M000991**

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522  
printed on recycled paper

Registration No. 11339  
Cert. Mail No. P371603090

No. **36213**

## NOTICE OF VIOLATION

Date of Violation: January 31, 19 97 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Henrik Voldback Manager</u>	
Location of Violation (Address) <u>3801 E Marginal Wy So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As Above</u>	City, State <u>Seattle, WA</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main Baghouse stack not to exceed  
700 ppm NOx
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION January 1997 CEM report

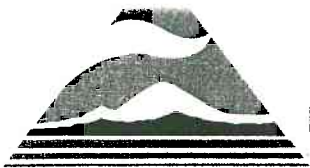
### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: M. Silber  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

2/4/97  
Date/Time

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
**AGCS2M000992**



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

March 27, 1997

Ash Grove Cement Co.  
Henrik Voldbaek  
3801 E Marginal Way S  
Seattle, WA 98134

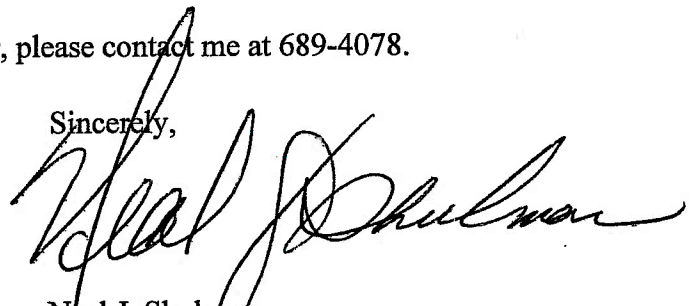
**Disposition of Notice of Violation Nos. 36210, and 36211  
Registration No. 11339**

Dear Mr. Voldbaek:

Based on the information you provided to us in your corrective action letter dated March 17, 1997, this Agency considers the above referenced matter closed and will take no further enforcement action in this case. If this problem of steam forming in the stack should recur in the future, please submit stack temperature, stack flow rate, moisture content of materials in the kiln and an estimation of the moisture content of the exhaust gas stack.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

RECEIVED

MAR 31 1997

110-SEATTLE

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

(206) 343-8800

(800) 552-3565

FAX: (206) 343-7522

printed on recycled paper

AGCS2M000993

Registration No. 11339  
Cert. Mail No. P371603090

No. **36211**

## NOTICE OF VIOLATION

Date of Violation: January 27, 19 97 at \_\_\_\_\_ m.

Name  <u>Ash Grove Cement Co.</u>	Responsible Person, Title  <u>Henrik Voldback Manager</u>		
Location of Violation (Address)  <u>3801 E Marginal Wy 50.</u>	City  <u>Seattle</u>	Zip  <u>98134</u>	County  <u>King</u>
Mailing Address  <u>As Above</u>	City, State  <u>Seattle, WA.</u>	Zip  <u>98134</u>	Phone  <u>(206) 623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☐ Section 9.09(b)(2) Unlawful to cause or allow the emission of an air contaminant as determined by a CEMS greater than 5% opacity for a 1 hr. Ave.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION January 1997 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Submit method 7 reader certifications.  
Also provide an engineering analysis documenting whether or not  
stack conditions were below the dew point.

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

2/4/97  
Date/Time AM

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
**AGCS2M000994**



Registration No. 11339  
Cert. Mail No. P371603090

No. **36210**

## NOTICE OF VIOLATION

Date of Violation: January 27, 19 97 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldback Manager		
Location of Violation (Address)  3801 E Marginal Wy So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State  Seattle, WA.	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section 9.09(b)(1) Emission from the main stack shall not exceed 20% opacity in any 3 minute period as measured by a CEMS.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION January 1997 CEM report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Submit method 9 reader certifications. Also provide an engineering analysis documenting whether or not stack conditions were below the dew point.

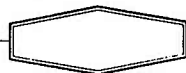
Issued By: M. Gilpin  
Air Pollution Inspector

2/4/97  
Date/Time

Received By: \_\_\_\_\_

Signing this Notice is not an admission of guilt

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 17, 1997

Neal J. Shulman  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Mr. Shulman:

**Re: Notice of Violation 36210 & 36211**

The plume on January 27, 1997 was observed by myself (certificate no. 94-01-60), Jerry Brown (certificate no. 94-01-53) and Bob Morey (certificate no. WA-F96-14). There was no actual recording of the reading as the plume was expected (see January 1996 CEM report).

The stack temperature as it relates to the dew point cannot be obtained as no moisture readings were taken during the startup. A chart of the stack temperatures has been included though. It should be noted that it never exceeded 95 deg. F. during this period (04:00 - 23:00). As stated in the addendum to January's CEM, we had installed a large amount of refractory with a high water content. Included is an in-house report showing that this was about 1,050 cu. ft. Also included is a copy of the report submitted last year by the refractory installer. Using the numbers from the installer (150 lb/cu. ft. And 10% water) we find that this years installation had a moisture content of 15,750 lbs. It can be assumed that all the moisture was released during the heat up (this is part of what the heat up is designed to do).

It should also be noted that during this time there was no feed going to the kiln and the kiln bag house was operating normally. The bag house cannot be bypassed.

Sincerely,

J. Trygve Grey  
Process Engineer

Time	meas. Value	zero Cal	span Cal	subst. Value	EXCEED RC	CA	RC	CA	----- 1234567890	----- 1234567890	----- 123456
------	----------------	-------------	-------------	-----------------	--------------	----	----	----	---------------------	---------------------	-----------------

=====  
Date: 01/27

00:00	38.75	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
00:15	39.85	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
00:30	40.15	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
00:45	40.42	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
01:00	40.52	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
01:15	40.63	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
01:30	40.75	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
01:45	40.53	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
02:00	40.30	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
02:15	40.24	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
02:30	40.07	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
02:45	40.03	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
03:00	39.98	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
03:15	39.85	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
03:30	39.53	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
03:45	40.86	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
04:00	44.57	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
04:15	49.56	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
04:30	53.81	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
04:45	57.96	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
05:00	58.27	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
05:15	58.17	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
05:30	58.84	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
05:45	59.58	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
06:00	60.16	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
06:15	60.55	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
06:30	62.83	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
06:45	67.87	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
07:00	71.88	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
07:15	72.01	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
07:30	71.26	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
07:45	71.79	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
08:00	73.67	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
08:15	71.16	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
08:30	67.84	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
08:45	65.65	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
09:00	63.91	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
09:15	62.45	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
09:30	61.14	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
09:45	60.09	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
10:00	62.70	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
10:15	66.06	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
10:30	66.27	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
10:45	66.54	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
11:00	66.51	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
11:15	67.09	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
11:30	67.24	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
11:45	67.56	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
12:00	67.87	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
12:15	68.01	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
12:30	68.00	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
12:45	67.90	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
13:00	67.51	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
13:15	68.27	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
13:30	68.03	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
13:45	68.23	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
14:00	68.41	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
14:15	68.07	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----

15:30	73.84	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
15:45	75.95	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
16:00	77.43	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
16:15	78.67	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
16:30	80.07	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
16:45	81.16	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
17:00	81.97	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
17:15	82.47	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
17:30	82.99	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
17:45	83.28	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
18:00	83.48	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
18:15	83.76	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
18:30	84.40	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
18:45	84.02	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
19:00	81.29	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
19:15	79.99	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
19:30	79.33	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
19:45	80.49	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
20:00	84.01	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
20:15	85.38	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
20:30	86.06	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
20:45	87.18	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
21:00	87.79	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
21:15	88.31	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
21:30	88.82	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
21:45	89.28	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
22:00	90.07	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
22:15	90.39	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
22:30	92.16	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
22:45	93.08	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
23:00	93.60	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
23:15	94.02	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
23:30	94.40	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----
23:45	94.81	0.00	0.00	0.00	0	0	0	0	-----8--	-----	-----



# **ASH GROVE CEMENT COMPANY**



WESTERN REGION  
INTER-OFFICE MEMORANDUM  
SEATTLE PLANT

**Date:** February 5, 1997  
**To:** Henrik Voldbæk  
**From:** Nate Fernow  
**Subject:** January 1997 Kiln Outage & Repairs  
**Copies:** Mike Dwyer, Bob Morey

---

The January outage was used to replace several areas of meager refractory that have plagued the plant over the last few years. Listed below are the major areas and the materials that were used in the repairs.

1. Calcliner Exit, Crossover to Stage 5: This area was original refractory from commissioning and began with a failure that plugged stage 5 shortly after we began to burn tires. It was originally believed that the higher 5<sup>TH</sup> stage exit temperature was to blame for the plug, but the resultant steel damage in the area was soon discovered and revealed the true nature of the plug. It is my belief that the need to utilize our Cardox system to keep the riser section clear stressed the area with repeated percussion causing an anchoring system failure. The area continued to degrade over the year until it covered about 70% of the north wall of the crossover, ~ 300 sq. ft. of A. P. Green Lo-Abrade was gunned in the area to a full thickness of 9". The refractory was anchored by standard V anchors on ~12" centers.
2. Kiln Riser & Feed Hood: This area also had seen severe duty from buildup and using Cardox. It had been patched several times since it was installed during the 1995 Kiln Outage. The material installed at that time was Plibrico's Pligun 36Z, a 10% Zircon gunnite material. We removed all the refractory from the brick retaining ring at the base of the calciner to the feed shelf and replaced it with Pryor-Giggey's Kergun MZ, also a 10% Zircon gunnite material. There was ~1100 sq. ft. of material gunned to a nominal thickness of 9 inches with the corners and lower edges fared to minimize buildup. We were also able to install a test section of a 50% Silicon Carbide refractory on the lower section of the North wall. This was installed in two components, half the thickness of insulating material, followed by the Silicon Carbide material. Material for this trial was supplied by Resco Products.

The steel in the Western wall of the riser had lost its refractory at two or three occasions during the last two years and patched. The resulting damage during the losses had caused the wall to bow outward making repairs to the expansion joint difficult and would have caused further cracking of the joint. We opted to have 70% of the lower wall replaced with new steel and revise the stiffeners to add support that would resist bowing in the future. The labyrinth and flexural components of the expansion joint, the air cannons nozzles, the cardox port sleeves, analyzer probe port, and access doors throughout this section were restored to serviceable condition prior to the refractory installation..



*Refractory Sales and Construction Services*

February 28, 1996

Ash Grove Cement Company  
3801 E Marginal Way South  
Seattle, WA 98134

Attention: Mr. Nate Fernow

Reference: Refractory Dryout - Steaming

Dear Nate:

This is to confirm recent discussions regarding steaming that is inherent to the bakeout of newly installed refractory linings, and in particular to those linings installed with castable and/or plastic refractory.

Monolithic refractories (castables and plastics) contain as much as 10% water by weight, and in some instances more. Those instances are quite often insulating castables which contain much higher quantities of cement - thus, the need for additional water to achieve hydration.

During bakeout this water is released as steam. This accounts for the careful bakeout procedures issued by manufacturers to avoid steam explosions. Please review enclosed article.

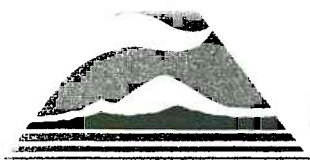
Your recent bakeout involved approximately 850 cubic feet of monolithic refractory at an average density of 150#/cu. ft. At an estimated mean of 10% water, the bakeout released 12,750# of water, or 1,530 gallons, in the form of steam.

Rainier Refractories appreciates this opportunity to serve your refractory requirements. Should you have questions, or if we may be of assistance to you in any way, please contact me at your convenience.

Respectfully,  
RAINIER REFRACTORIES, INC.

*Rick Foltz*  
Rick Foltz

cc: Matt Lazzari



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    -    SNOHOMISH COUNTY

March 3, 1997

Ash Grove Cement Co.  
c/o Henrik Voldbaek  
3801 E Marginal Way S  
Seattle, WA 98134

Dear Mr. Voldbaek:

**Disposition of Notice of Violation Nos. 36207, 36208, and 36209  
Registration No. 11339**

Based on the information you provided to us in your December CEM Report and corrective action letter dated January 29, 1997, this Agency considers NOV No. 36208 closed and will take no further enforcement action in this case. We concur that the December 23, 1996 event meets the criterion of the WAC 173-400-107(6) excess emissions due to upsets.

The Agency considers NOV No. 36209, in which Ash Grove exceeded the 501 ppm 24 hour NO<sub>x</sub> limit on December 14, 1996, closed. We will take no further enforcement action in this case.

*Aug 3/13*  
NOV No. 36207 remains open. The Agency believes that this exceedance could have been prevented by having coal readily available on site.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

*[Signature]*  
Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

▲ (206) 343-8800 ▲ (800) 552-3565

FAX: (206) 343-7522  
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AGCS2M001001

Registration No. 11339  
Cert. Mail No. P371603090

No. **36208**

## NOTICE OF VIOLATION

Date of Violation: December 23, 19 96 at \_\_\_\_\_ m.

Name  Ash Grove Cement Co.	Responsible Person, Title  Henrik Voldbaek Manager		
Location of Violation (Address)  3801 E Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  as Above	City, State  Seattle, WA.	Zip  98134	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from main Baghouse stack not to exceed 700 ppm NO<sub>x</sub> 10% O<sub>2</sub> 1 hr. Ave.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1996

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

Date/Time 2/4/97

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M001002



Registration No. 11339  
Cert. Mail No. P371603090

No. 36209

## NOTICE OF VIOLATION

Date of Violation: December 14, 1996 at \_\_\_\_\_, m.

Name  <u>Ash Grove Cement Co.</u>	Responsible Person, Title  <u>Henrik Voldback Manager</u>		
Location of Violation (Address)  <u>3801 E Marginal Way So.</u>	City  <u>Seattle</u>	Zip  <u>98134</u>	County  <u>King</u>
Mailing Address  <u>As above</u>	City, State  <u>Seattle, WA.</u>	Zip  <u>98134</u>	Phone  <u>(206) 623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☒ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(5)
- ☐ Section Emissions from the main baghouse stack not to exceed 501 ppm  
10% O<sub>2</sub> 24 hr. Avc
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1996 CEM Report

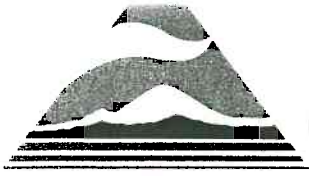
### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbc)

2/4/97  
Date/Time gme

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
AGCS2M001003



PUGET SOUND AIR POLLUTION CONTROL AGENCY  
KING COUNTY    ▲    KITSAP COUNTY    ▲    PIERCE COUNTY    ▲    SNOHOMISH COUNTY

March 27, 1997

Ash Grove Cement Co.  
Henrik Voldbaek  
3801 E Marginal Way S  
Seattle, WA 98134

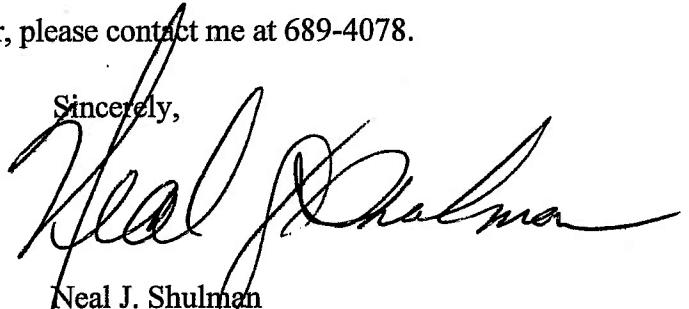
**Disposition of Notice of Violation No. 36207  
Registration No. 11339**

Dear Mr. Voldbaek:

Based on the information you provided to us in your corrective action letter dated March 13, 1997, this Agency considers the above referenced matter closed and will take no further enforcement action in this case.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,



Neal J. Shulman  
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA  
Elizabeth M. Gilpin, PSAPCA  
Melissa McAfee, PSAPCA  
Fred L. Austin, PSAPCA

EMG\cbc

RECEIVED

MAR 31 1997

AGCW-SEATTLE

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Commissioner, Kitsap County  
Member at Large  
Mayor, Everett

Mayor, Bremerton  
Snohomish County Council  
King County Executive

**AGCS2M001004**

Mayor, Tacoma  
Mayor, Seattle  
Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038

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(800) 552-3565 ▲

FAX: (206) 343-7522

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Registration No. 11339  
Cert. Mail No. P3716030910

No. **36207**

## NOTICE OF VIOLATION

Date of Violation: December 15, 1996 at \_\_\_\_\_ m.

Name <u>Ash Grove Cement Co.</u>	Responsible Person, Title <u>Henrik Voldback Manager</u>		
Location of Violation (Address) <u>3801 E Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>As above</u>	City, State <u>Seattle, WA.</u>	Zip <u>98134</u>	Phone <u>(206) 623-5596</u>

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION \_\_\_\_\_ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Deposition of mud, dirt, or debris from vehicle or load onto a paved public roadway.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Failure to meet Order of Approval No. 5730, Condition No. 6(B)
- ☐ Section Emissions from the main Baghouse stack not to exceed 700 ppm NOx  
10% O<sub>2</sub> 1 hr. Ave.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION December 1996 CEm Report

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to **submit a written report within ten (10) days of receipt of this Notice** describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, **and** take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

2/4/97  
Date/Time

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt

AGCS2M001005

# ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 13, 1997

Neal J. Shulman  
Puget Sound Air Pollution Control Agency  
110 Union Street, Suite 500  
Seattle WA 98101-2038

Dear Mr. Shulman:

**Re: Notice of Violation 36207**

It was stated in your letter dated March 3, 1997 that the Agency felt that Ash Grove could have avoided the exceedence by having coal readily available. To clarify our addendum to the December 1996 CEM report, coal was available. The previous day, we had received a barge of whole (unpulverized) coal. After we receive the whole coal, it is pulverized and dried in a bowl mill before it is fired in the kiln. This is where the problem occurred.

This was the first barge received from this source and although we had laboratory data supporting its quality, we were unfamiliar with its physical characteristics. The coal received had a higher moisture than the coal from our usual source making operations of our coal mills difficult. Among other things, the moisture in the coal was causing our rotary feeders to plug, frequently shutting down the mills

The coal firing system is an indirect system. It is dependant on kiln operation to provide an inert source of process gasses for the drying and grinding. Due to these reasons, it is impossible to build an inventory of pulverized fuel without the kiln running (it is impossible for us to grind and create an inventory before starting the kiln). Furthermore if the mills are not able to operate for reasons as mentioned above, it is impossible to maintain the inventory of pulverized fuel we have on hand. To restate our position, it was not that we didn't have coal on hand, but rather unforeseen process problems beyond our reasonable control.

Sincerely,

J. Trygve Grey  
Process Engineer



110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339

Cert. Mail No. 2035 473 361

No. 35757

## NOTICE OF VIOLATION

Date of Violation: February, 1996 at .m.

Name  Ash Grove Cement Co.		Responsible Person, Title  Gerry Brown Safety Manager	
Location of Violation (Address)  3801 E. Marginal Way So.	City  Seattle	Zip  98134	County  King
Mailing Address  as above	City, State	Zip	Phone  (206) 623-5596

### DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

#### REGULATION OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
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- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
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- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☐ Failure to meet Order of Approval No. \_\_\_\_\_, Condition No. \_\_\_\_\_
- ☒ Section NOC 5730 Condition # 6(b) emissions from the main baghouse  
stack not to exceed 700 ppm.
- ☐ Section \_\_\_\_\_

FACTS ALLEGED TO CONSTITUTE A VIOLATION Causing or allowing the emission  
of NOx from the main baghouse stack on Feb 21 1996 in excess  
of the permit condition.

### CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By: [Signature]  
Air Pollution Inspector  
Form No. 70-119 (Revised 12/95 cbe)

4/30/96  
Date/Time

Received By: \_\_\_\_\_  
Signing this Notice is not an admission of guilt  
AGCS2M001007